

**Before the
Federal Communications Commission
Washington, DC**

In the matter of:

Jerry Szoka,
Creation of a Low Power
FM Radio Service

Docket No. MM 99-25

To: To: The Commission

Reply Comments in Support of a New LPFM Service

Grid Radio (GR), Cleveland, Ohio, created and operated by Jerry Szoka since September, 1995, strongly supports the creation of a new low-power FM (LPFM) radio service as proposed in the Commission's January 29, 1999 notice of proposed rulemaking (NPRM). The proposal recognizes the need for the new voices and content on the FM broadcast spectrum, the demand reflected by the several hundred LPFM pioneers—such as GR who seek official recognition for their broadcast activities, the Commission's statutory obligation to use the spectrum fully, efficiently, and in the public interest, and its constitutional duty under the First Amendment to refrain from silencing or punishing speakers such as GR.

I. Core Principles: maximize speakers and minimize regulation.

GR commends the Commission for issuing notices of inquiry in response to rulemaking petitions RM-9208 and RM-9242, followed by this NPRM. The proposal reflects careful thought and, with some modifications discussed herein, will be a viable and sustainable alternative to the extreme increase in demand and the substantially reduced number of discrete voices using the spectrum. The issuance of the NPRM demonstrates the Commission's political courage in the face of hostility from entrenched incumbent interests, notably NAB and NPR, and fidelity to its statutory duty and constitutional mandate.

Radio is perhaps the best qualified and most efficient of any media outlet to

provide community access. It is a relatively inexpensive medium to produce and is well-suited to cover community issues and local culture. New LPFM stations will strengthen community identity in urban neighborhoods, rural towns and other communities which are currently too small to win attention from A mainstream,≡ ratings-driven media. They will provide the opportunity for individual citizens and small groups of citizens to operate radio broadcast services. The dramatic increase in the number of speakers will expand the variety of subjects presented and types of entertainment presented. New musical groups will present their products to society and new social and political options will be discussed. Specialized stations will arise addressing specific subjects and activities such as golfing, flying, archery, energy conservation, ecology, animal rights, gay rights, etc., and/or serving smaller audiences. The public will be much better served from the increased competition in voices and content choices provided by LPFM.

The LPFM service will also provide significantly greater opportunities for direct citizen involvement in broadcasting. This is in sharp contrast to the current situation where broadcasting is limited to wealthy corporations. The only direct citizen access provided currently on A mainstream≡ radio is an occasional minute or two on talk radio. The new LPFM stations will supplement, rather than replace, the services provided by A mainstream≡ media. Furthermore, through competition from micro stations, mainstream media will naturally have an incentive to become more responsive to new ideas, alternative content, and smaller audiences.

Two forces will shape LPFM, which will drive the FM service in new directions. First, because micro stations serve areas which range in size from small to tiny, they must be highly responsive to the specific communities in which they are located. They cannot chase after mass markets because they lack the technological resources to capture such markets. They must chase after A niche markets≡ in their communities. Grid Radio is one such A niche market.≡

There is an important exception to the general inability of micro radio to compete for mass markets. Micro stations may be able to enter and serve mass markets by growing their own. If they can find a A niche market≡ with potential for mass appeal, but which is too risky or controversial or experimental to attract conventional radio stations, micro stations can prosper through such innovation.

Second, micro stations will have small operating revenue requirements because they have small service areas and very modest equipment requirements. As a result, they will not require a large and steady flow of advertising dollars and expensive professional staffs. Micro stations will be free to experiment with new and exciting community dialogue, without running the financial risks that constrain larger stations. In short,

survival for micro stations will require attentiveness to A niche markets and community concerns, without the traditional corresponding need to Asell these audiences to advertisers.

Unfortunately, the US radio broadcasting industry has experienced an unprecedented wave of consolidation and mergers over the past three years since passage of the Telecommunications Act of 1996. As a result, the electronic medium best suited to inexpensive, local programming has become arguably the most regimented and centralized of all major media. Congress intended radio to serve the broader public interest, incorporating this mandate in the Communications Act of 1934.¹ More fundamentally, radio is supposed to serve the ends and purposes of the First Amendment, especially to protect and promote the public discourse in ideas and culture, which is essential to our form of democratic self-government. But the current regulatory regime for radio serves to thwart the First Amendment rights and interests of most Americans. We speak little, if at all, on our own airwaves, while the wealthy may speak through radio by controlling who uses their stations and for what purposes. What good is AFreedom of Speech if nobody can afford it? Is speech truly free if only the wealthy can buy it?

Even a multimillionaire would have trouble entering the radio broadcasting industry today because economies of scale (permitted by the abolition of ownership restrictions in the Telecommunications Act of 1996) demand that a firm own numerous stations in several markets to be even remotely competitive. As for the person of average means, their lot is limited to being a passive consumer of an increasingly monopolistic

¹ Congress passed the Communications Act of 1934 to secure the benefits of newly developing technologies. Several provisions of the Act impose an affirmative duty on the Commission to facilitate speech and maximize the number of speakers in pursuit of the public interest mandate. See 47 U.S.C. § 303(g)(FCC required to Astudy new uses for radio, provide for experimental uses of frequencies, and generally encourage the larger and more effective use of radio in the public interest); 47 U.S.C. § 303(y) (authority to allocate spectrum Ato provide flexibility of use consistent with treaties, in the public interest, and without Aharmful interference among users); 47 U.S.C. § 157(a)(It shall be the policy of the United States to encourage the provision of new technologies and services to the public); 47 U.S.C. § 307(b)("the Commission shall make such distribution of licenses, frequencies, hours of operation, and of power among the several States and communities as to provide a fair, efficient and equitable distribution of radio service to each of the same.")(emphasis added) 47 U.S.C. § 151 (FCC shall regulate Ato make available, so far as possible, to all the people of the United States . . . a rapid, efficient, Nation-wide, and world-wide wire and radio communication service with adequate facilities at reasonable charges); 47 U.S.C. § 326 (Commission has no Apower of censorship over the radio communications or signals transmitted by any radio station, and no regulation or condition shall be promulgated or fixed by the Commission which shall interfere with the right of free speech by means of radio communication); see also § 257(b), Telecommunications Act of 1996 (ANational Policy: In carrying out subsection (a), the Commission shall seek to promote the policies and purposes of this Act favoring diversity of media voices, vigorous economic competition, technological advancement, and promotion of the public interest, convenience, and necessity.). Generally this obligation requires maximizing the number of users on the electromagnetic spectrum and reducing gaps in coverage.

industry that has less and less competitive pressure to heed the diverse, highly localized needs of listeners. And, radio increasingly has little to offer for poor people and others who are considered unimportant to the advertising community. The corporate giants that own an ever increasing majority of the media outlets are getting ever richer at the expense of the public and First Amendment values while the general public is drowning in a sea of commercialism.

Again, the great tragedy of this situation is that radio is the ideal medium to provide an accessible local service for democratic communications of interest and value to the entire population. These small local stations will enrich the public's understanding of civic issues and social problems. They will be a modest but important step toward more cohesive communities, a renewed public discourse, and a richer and more diverse and responsive culture. It is not often that a federal agency can achieve so much with so little.

A listener in Cleveland put it all in perspective when she complained about the sameness of Cleveland radio following two huge radio company mergers: *It's as though McDonnell's bought every restaurant in town and all you could get was a Big Mac.* The right to broadcast directly to the local community is not a right to be doled out to the favored few by the federal government, but a right to be boldly claimed, exercised and fought for by American citizens. The strong interest in independent microradio stations shows that the creation of an LPFM service has wide and immediate support. The tremendous public demand for microradio is demonstrated by the proliferation of hundreds small entrepreneurial radio stations popping up all around the country, whose operators (including GR's Jerry Szoka) broadcast at the risk of financial losses, equipment seizure, and in some cases, even imprisonment.

The Commission imposed a regulatory ban on low-power stations, under 100 watts ERP (except in Alaska) beginning in 1978. Such a blanket ban by the Commission is both a violation of the First Amendment to the United States Constitution and is contrary to the *public interest* standard of the Communications Act of 1934, as amended. In addition, the rapid growth of microradio and the nationwide support for micro radio among the public, shows that the FCC's decision to ban low-power radio was simply a mistake. In 1978, the Commission did not believe that there would be a strong demand or need for microradio. However, 20 years later it is manifest that there is such a demand and need.

The incredibly rapid consolidation in ownership of electronic media following the Telecommunications Act of 1996 has geometrically exacerbated this problem. Only a few dozen large corporations now control a large percentage of the radio stations in this

country and local programming, especially local public affairs programming, has become increasingly scarce.

In response to the above developments, unlicensed microradio stations (like Grid Radio) have sprung up by the hundreds throughout the United States to serve their neighborhoods and communities with truly local, community-based programming. Most importantly, 99% of these stations (including Grid Radio) have demonstrated that they can broadcast without causing interference to other users of the FM spectrum or any other service. This clearly demonstrates that the FCC's regulations have been overly restrictive, thereby strongly bolstering the argument that the FCC's restrictions in this area are unconstitutional. We cannot believe that the First Amendment could contemplate a regulatory scheme wherein 99.99% of the American people are legally barred from using one of the most effective media, absent an overwhelmingly compelling reason. The very existence of interference-free microradio demonstrates that no such compelling reason exists. The market has demonstrated, and the Commission has now finally conceded, that the historical justification for restricting unlicensed speech by radio, scarcity, no longer exists in the FM spectrum.

The FCC must use its authority to establish noncommercial LPFM stations -- to build a stronger democracy in America, and serve a vision broader than the profit-driven trivialization of most of the broadcasting and advertising industries. The FCC was not intended to merely protect the speech rights of broadcasters, advertisers and the wealthy. It ought to uphold and protect the public's First Amendment interests in radio, to rededicate radio to the service of democracy in America. After all, many new ideas and new concepts come from that one unreasonable individual, who few may listen to, especially a large corporation, yet time & time again, that crazy idea turns out to be accepted later in time. Microradio is a perfect forum in which such ideas can blossom.

II. THERE IS AN URGENT NEED FOR THE THE NEW LPFM SERVICE

The Commission has a legal obligation to preserve national security and protect the public interest under its basic governing statute. The Commission cannot under this mandate focus solely upon and promote a narrow range of interests, e.g., FM digital, NAB, and NPR. It must also be aware of, and responsive to, trends which endanger the larger society that the Commission is obliged to serve. There are at least three reasons why the Commission should treat this proposal as an urgent matter. Three converging social trends are now clearly evident. The new LPFM service will help address each of these important problems. First, many families and neighborhoods are in a state of

deterioration or collapse, especially (but not exclusively) in urban areas with low per capita incomes. Second, due to changes ranging from A welfare reform≡ to cutback in mass transit funding to the relocation of businesses from cities to the suburbs, fewer dollars are flowing into struggling communities from the outside world. Third, there is a growing consensus that many damaged families and communities cannot recover, and in some cases may not even survive without a strengthening of community ties and a rebirth of community values.

The new LPFM service must be viable. That is, it must be capable of sustaining itself -- financially, operationally, and otherwise. At the same time, the new Service must also be meaningful. That is, it must actually make a major difference in the diversity of radio ownership and radio programming.

The LPFM service can bring a wide range of benefits to American society -- including community revitalization, upward mobility, releasing human potential, more choices for listeners, and the defense of democracy (which depends, after all, on freely flowing information and ideas). Nevertheless, these benefits will be illusory and Avaporware≡ unless the LPFM regulations facilitate and implement a new service that is both viable and meaningful.

Several issues raised in the Commission=s NPRM are particularly crucial, requiring some modest modifications.

III. MODIFIED PRIMARY SERVICE STATUS FOR LP-100 AND LP-10 STATIONS.

As proposed by the Commission, LP-100 and LP-10 stations should be: (a) licensed; and (b) established as the general urban and suburban norm for LPFM station wattage and HAAT. As contemplated (but not actually proposed) by the Commission, LP-10 stations should also be licensed primarily in A urban core≡ areas, or other areas where population density is much higher than the urban and suburban norm, and perhaps in small towns and villages as well. Unfortunately, many of these newly licensed LP-100 and LP-10 stations will have a tragically short life expectancy unless they are shielded from Abumping≡ by larger stations (including larger LPFM stations). The new LPFM service should accord LP-100s and LP-10s a modified form of primary service status: that is, a new variant, under which they could neither be Abumped≡ by others nor Abump≡ others themselves.

Larger LPFM stations, perhaps in the range of 250 watts, should be afforded full primary status.

The Commission provided no particular reason for proposing fixed power limits of 10, 100, and 1000 watts for each sub-class of LPFM station, other than perhaps administrative convenience. Each new LPFM stations should be permitted to specify a power and antenna height combination that will fit within the available spectrum space. This will provide a more efficient use for the scarce spectrum resource.

LP-1000 stations should be kept out of urban areas in order to maximize the number of independent voices. The FCC's own study shows metro Denver can accommodate one LP-1000 or four LP-100s. In metro Minneapolis, the choice is one LP-1000 or nine LP-100s. Clearly, unless LP-1000s are barred by law from the nation's largest metropolitan areas, dozens -- or even hundreds -- of LP-100s and LP-10s will be strangled in the cradle. Further, the only ones to benefit from this slaughter of opportunity will be false LPFM stations, sized to operate in practice as just another herd of Class A stations -- in miniature,

At a minimum, LP-1000s should be limited to areas with population density of 1,000 people per square mile. Alternatively, limit LP-1000s to areas outside the top 50 markets. Again, these are the minimum restrictions suggested for LP-1000s. GR would not object to stronger restrictions, including a complete substitution of LP-250s for LP-1000s.

IV. MODIFICATIONS TO THE ALLOCATION OF FREQUENCIES ARE NEEDED TO MAXIMIZE THE NUMBER OF STATIONS WHILE MINIMIZING HARMFUL INTERFERENCE.

The FCC should use a prohibited contour overlap method (as opposed to the proposed distance separations) of predicting interference, as is now easily done in the Low Power Television Service with the appropriate computer program. The LPTV service uses a computer program, LP-ONE, to show if a proposed station would cause interference to an existing station. It would be a one time cost to have a similar program written for LPFM processing. This would allow for many more LPFM stations to be created nationwide and would make the use of standard directional patterns feasible. This type of processing would allow use of directional antennas, as is done in the LPTV service, allowing many more LPFM stations to be created by broadcasting the signal where needed while limiting the signal in the direction of stations that need to be protected. The directional antenna patterns would be included in the FCC directional antenna database and thus using their patterns would be a simple matter.

If the FCC were to utilize the strict Δ mileage separation tables \cong as proposed in the NPRM, many major markets will not receive any LPFM stations. Many small markets still have allocations for full-power channels to be assigned, but the larger cities are packed full with full-power stations and the only way to get a new FM station on the air there is to buy an existing one at an exorbitant price, in most cases. By simply using the Δ prohibited contour overlap \cong method, many of the major markets will be able to be served by one or more LPFM stations. If a channel does not meet the strict mileage separations in the FCC's currently proposed Δ mileage separation table \cong then the channel cannot be used; however, in many cases channels could be used using a directional antenna to restrict the power in the direction of the station that would otherwise suffer impermissible interference. The signal protection ratios remain the same as with the Δ mileage separation tables \cong but applicants can then have channels available where none were before under the strict Δ mileage separation tables \cong . This method is also called the Δ desired to undesired signal ratio \cong method.

After studying the computer program that the FCC used to calculate the number of LPFM channels that might be available, it is quite apparent that the currently proposed system of Δ mileage separation tables \cong will severely limit the number of LPFM stations that might be created, especially in major markets where no full-power FM channels are available. Thus, it is imperative that the FCC adopt this Δ prohibited contour overlap \cong method of processing and predicting interference, if the LPFM service is to flourish nationwide.

LPFM must not be subject to a narrower bandwidth than full-power FM stations since audio quality could suffer and both the 2nd and 3rd adjacent channel restrictions must be dropped for LPFM stations. Improvements in receiver design since the rules were written decades ago will allow these restrictions to be dropped without causing interference to existing stations or planned digital signals (whether IBOC or another standard). Hundreds of full-power (grandfathered short-spaced) FM stations have been operating on 2nd and 3rd adjacent channels for several years with no interference complaints. Also, GR, operating on 96.9 mhz. since its inception has not caused interference to communications of any kind. If this and other stations do not cause interference neither will lower power LPFM stations.

In MM Docket No. 96-120, RM-765 I, adopted August 4, 1997, the Commission received almost unanimous support in comments from numerous consulting engineering firms and broadcasters for completely disregarding the second adjacent channel and third adjacent channel restrictions for applications from grandfathered short-spaced FM stations seeking to improve their facilities. A sample of the comments and the

Commission's conclusion appear below:

General support.

Of the parties providing initial and reply comments on this proposal, most agree that we should completely eliminate second-adjacent and third-adjacent spacing requirements for grandfathered stations. The Joint Petitioners fully support the original Proposal 2, and specifically reject the alternative proposal put forth in Paragraph 26 of the Notice. AFCCE supports the original Proposal 2, and states that it is the most essential part of the simplified procedure. Mullaney supports the original proposal 2. CTI fully supports Proposal 2, stating that today's receivers are seldom affected by second-adjacent and third-adjacent channel interference.

Media-Com, Inc. and Group M Communications, Inc. both support Proposal 2 and state that current second- and third-adjacent channel restrictions have prevented grandfathered stations from improving, or even maintaining existing service areas. Compass Radio of San Diego, Inc. (A Compass_≡) fully supports Proposal 2, stating that adoption would facilitate improvement of station facilities, along with eliminating a significant amount of unnecessary workload on the Commission's staff. Compass_≡ comments include specific examples of stations that have operated with second-adjacent or third-adjacent overlap. without receiving interference complaints.

Conclusion

The NAB filed comments in support of disregarding the second and third adjacent channel restrictions in this proceeding but added a comment that they were concerned about the possibility that this or a future Commission might modify its overall FM allocations criteria, based on the record in the instant proceeding. Thus the NAB would have us believe that interference will not occur on second and third adjacent channels, but only for a certain class of stations covered in this proceeding, namely grandfathered short-spaced FM stations. They gave no evidence in their comments in the proceeding supporting this view scientifically. Indeed, the laws of physics relating to second and third adjacent channel interference would be the same regardless of the class of FM station considered. Put simply, a receiver doesn't know the Aclass_≡ of the FM station it is receiving and will not receive interference based on the station's Aclass_≡, grandfathered or new.

NAB's comments in this regard are anti-competitive in nature and should not be given weight in this matter. For the reasons stated above, it is requested that only co-channel and first adjacent channels be studied in predicting interference for applications for new LPFM stations. As has been pointed out, any very small amount of interference that might occur would be around the immediate vicinity of the LPFM transmitter site and based on the low power being used would be a very small area indeed, probably in the neighborhood of a hundred feet or less, if at all. Clearly the paramount public interest, convenience and necessity is best served by promoting the creation of these LPFM stations, thereby fostering competition and diversification of ownership of mass media. The Supreme Court has long recognized that: AIn setting its licensing policies, the Commission has long acted on the theory that diversification of mass media ownership serves the public interest by promoting diversification of program and service viewpoints, as well as by preventing undue concentration of economic power.≡ FCC v. NCCB, 436 U.S. 775, 780 (1978).

V. ANY MEW DIGITAL AUDIO SERVICE MUST NOT IMPEDT THE RAPID IMPLEMENTATION OF AN LPFM RADIO BROADCAST SERVICE.

No terrestrial digital audio broadcasting technology should be authorized by the FCC or implemented which would reduce the possibility of authorizing and implementing a new LPFM service, as has recently been the subject of comments in RM Nos. 9208, 9242, and 9246.

GR strongly objects to the introduction of digital technology into the existing broadcast services in such a manner as to preclude a new microradio service. New digital technology might enhance the sound quality of radio and provide additional possibilities for auxiliary secondary services. On their own, these improvements are unobjectionable. However, an improvement in sound quality is of little weight when measured against the First Amendment rights of hundreds of new LPFM stations, the thousands of new voices they will bring to the American public, and the scores of communities who are awaiting a new, truly local, community voice.

One question that begs answering is, Ato what extent is the rush to IBOC market driven?≡ The proposal makes a vague proclamation that consumers are expecting higher quality audio than is currently available on the radio. While probably no one would object to the idea of higher quality audio by itself, the question must be raised: Aat the expense of what other improvements that can be made to our radio service will we receive this higher quality sound?≡ GR is unaware of any consumer demand for Abetter≡

audio quality from the FM broadcasters. It would be interesting to see what the American public would choose if we were presented with the choice of having five times as many radio stations competing for our listening, or CD quality sound on the ones that they already have. GR recommends that the FCC find independent data about what the American public really wants from radio before going ahead with a plan that ignores the potentialities for more channels. Consumers already have a wide array of choices that arguably provide a better sound quality, even in the automobile. What consumers don't have, and what this proceeding should provide, is a realistic choice among a larger number of broadcasters.

Obviously, more channels means lower market share for existing broadcasters. However, even the 1996 Telecommunications Act does not mandate that the FCC regulate in the interest of the profit margins of existing broadcasters: rather, it mandates only that the FCC regulate in the public interest.

The standard level of signal to noise ratio today is 60 dB- with digital broadcasting, it may be 90 dB. While improvements in background noise are always welcome, most radio listeners today listen at work, or in their car, where ambient noise levels make such a difference unnoticeable. On the other hand, radio audiences have steadily been declining over the past several years. Thousands of individuals have risked severe fines and prison in order to diversify the options that are available on the radio dial. It is at least worth asking whether a plan that maintains the interests of the current players in the marketplace is truly serving the public's needs.

A. USADR's Proposal

It is possible that the USADR proposal does, in fact, meet GR's concerns. USADR states that, A The IBOC DAB system should improve broadcasting not only through the digital signal, but also for AM and FM analog reception. . . . Reception is improved because rejection of the adjacent channel interference is greater and noise for the analog signal is lower. =

Further, USADR states that, A Results indicate that, with two high-level first-adjacent interferes which would only be present in a short-spaced scenario . . . the hybrid signal has a margin of 3 dB at the protected contour of a Class B station. Hence, even in an arguably worst-case mobile environment with both digital side bands impacted by large analog interferes, the system continues to deliver virtual CD-quality digital audio out to a Class B station's protected contour, with margin. =

Additionally, USADR states, A Second adjacent channel interference- . . . the digital side bands of the hybrid second adjacent signal fall well outside the bandwidth of

the desired FM signal. . . . As a result, the effects of second-adjacent hybrid and all-digital I.B.O.C. signals should be negligible.≡

These statements indicate that the USADR system may well tolerate interference at least as well, or even better than, the current analog system. If so, then there would be no conflict with the re-authorization of a microradio system. GR=s concern over the possible conflict between digital FM and an LPFM service would be very substantially abated if USADR confirms that its system will tolerate the authorization of a significant number of new microstations.

The FCC=s current second and third adjacency rules must be relaxed to more realistic levels in order to further the implementation of the microradio system. Hopefully, USADR will confirm that the relaxation of the second and third adjacency rules is not inconsistent with its proposal.

B. I.B.O.C. vs. Eureka 147

GR endorses the general thrust of the comments of the Citizens Media Corps, of Brookline, MA, submitted in this proceeding, in particular their statements regarding the apparent superiority of the Eureka 147 system over an IBOC system. Specifically the following statement from the Citizens Media Corps= comments: A We believe it would be in the best interests of the citizens of the United States for any digital system to be implemented in a new spectrum area, following the guidelines that have been set down by the World DAB Congress. It is by no means a foregone conclusion that new spectrum cannot be found.≡ If the new broadcast radio service were entirely moved to a different portion of the spectrum coincident with the introduction of digital audio technology (as apparently is being done in most of the industrialized world), then the Commission could approach the allocation and engineering of such spectrum with a fresh perspective. Such a perspective could, from the first, design a system in which micro broadcasting and digital audio would be perfectly compatible. A large variety of solutions might open up which, at present, are not readily available.

To create new spectrum for LPFM, which would necessitate the need to purchase new radios, would put undue burden on the public. Many people in many communities can barely pay their rent or mortgage much less be expected to buy all new radios with which to support community radio. That in itself would not be in the public=s interest. How much support do you think there would be from any community of good intention, if they are told that if you want to support community radio, that=s all fine and good, but there=s a catch, you have to buy a new radio to listen to it. And, what about all those car

radios? We all know we are a mobile society. It's just common sense to allow LPFM to exist on the existing spectrum..

A digital audio service in a new spectrum area would be preferable to an IBOC system. The Commission should delay approving the implementation of digital FM until the conflict with LPFM has been resolved. USADR should make whatever tests they think they need to make, and state once and for all whether their proposal will interfere with the Commission's stated objective of developing broadcast opportunities for a wider class of Americans. The implementation of a practical LPFM system can not be held hostage to technical flexibility and indeterminacy on the part of those who already control too much of radio. Low power FM should not be considered as an afterthought, a secondary service or of tertiary importance- the issues of control and management of media, of localism in broadcasting, of the availability of public forums for all citizens go to the heart of our democratic system of governance in a way that 30 dB of noise reduction never can. GR requests that the Commission demand that any new terrestrial digital audio broadcast technology be designed such that it does not adversely affect the re-authorizing a microradio broadcast service.

VI. TECHNICAL CONSIDERATIONS.

GR believes that it is very important for LPFM stations to operate with the maximum of spectral purity and without interference to the broadcasting of other radio services. LPFM transmitters should be subject to a Atype notification process where the Commission sets standards for the quality of the transmitter and other station equipment. The FCC should not require such equipment to be tested by an independent testing laboratory as that is costly and those costs are passed on to the noncommercial LPFM operator. In the same way, an LPFM applicant should not be able to build its own Akit transmitter and simply commence broadcasting. Transmitters should be built by manufacturers that make each unit to exacting standards and are able to test the units prior to release into the marketplace. Transmitter purchases should be controlled by requiring purchasers to present to the vendor a copy of the construction permit or license prior to the sale of a transmitter. This will not just insure that quality equipment is coming on the air but it also promotes new American small businesses as well as makes it more difficult for pirate stations to purchase this equipment once the new LPFM licensing scheme is in effect.

Problems, whether technical or otherwise, should be first referred to a local or regional voluntary microradio organization for technical assistance or voluntary mediation. The FCC should be the forum of last resort.

A. REDUCED BANDWIDTH AND ELIMINATION OF SUB CARRIERS:

LPFM stations should be able to operate with the same bandwidth for the main audio channels as regular full power and translator stations. Reluctantly, GR would be willing to give up authority to operate SCA services as long as it am able to provide a full stereo signal. Any transmitter that is currently available on the market for full power FM or translators should be usable on the LPFM service.

B. TRANSLATORS:

ALocal \cong translators. For the purpose of this rulemaking, a Local Translator is a translator or booster station where the primary station is located within 100 miles of the translator station at the time of release of the NPRM. These incumbent Alocal \cong translators are entitled to protection from LPFM stations.

ADistant \cong translators. Since the licensing of LPFM stations will undoubtedly bring on many new outlets for broadcasters presently excluded from the spectrum, any distant translators outside of the 100 mile radius of the primary station should have a secondary status to the LPFM station. These distant translator stations are not capable of providing a local service and should be placed in a lower spectrum priority. First and foremost, any LPFM should request a frequency which will permit the LPFM station and the distant translator to coexist. If no channels are available, the LPFM station may exclude the presence of the Distant Translator when choosing a frequency. The Distant Translator will be responsible for resolving the interference.

C. TECHNICAL CONTACT PERSON:

All LPFM applicants, regardless of station class should be required to specify a Atechnical contact person (TCP). \cong This person would be similar to a chief-engineer at a full powered station. This person would be a key contact for the Commission in the event that there is a problem with the station. The TCP would not be singularly responsible for the technical operation of the station but is available to provide guidance to the station operator. The TCP should have to sign a form the is kept on file with the FCC indicating that he has read and understands all equipment literature pertaining to the station, and its proper operation, and can take the necessary action should a problem occur.

D. USE OF AUXILIARY BROADCASTING SERVICES:

All classes of LPFM stations should have access to the auxiliary broadcasting services. These services could be used by LPFM stations for remote broadcast of local events, studio to transmitter links, and point to point network links for emergency situations.

E. UNATTENDED OPERATION:

LPFM stations should be permitted to operate unattended as long as there are mechanisms in place to turn off the station in the event of serious interference. This mechanism could either be a phone controlled link or a radio control link using either auxiliary broadcast, and mobile or amateur radio simplex frequencies. The TCP should be reachable by the Commission anytime the LPFM station is on the air. This should be done by the TCP or someone delegated by the TCP or licensee to be available by pager in order to quickly respond to Commission requests to resolve interference.

VII. THE LICENSING PROCESS:

A. APPLICATION REQUIREMENTS, PROCESSING AND FEES

Individuals and communities will be making real sacrifices to launch LPRS stations. A policy of prohibiting license renewal, after 7 years, would be unfair, and could discourage investment. LPFM stations should be given a 5 year temporary renewable license term. Such a short term would make the station more accountable for its local service as well as placing a necessary burden on LPFM licensees to renew their licenses to support the fact they are still interested in providing this local service. GR strongly opposes the concept of a nonrenewable license in an effort to pass the microphone to others. Through proper frequency coordination and time-sharing arrangements in lower power services (100 watts or less), many in crowded urban areas would have their turn at the microphone without having to wait several years for a license to expire.

All LPRS licenses should be renewable for 7 years after the 5 year temporary license has expired. As required by the Communications Act, the public interest should be the standard for granting or denying renewal of a license. To limit litigation, and/or reduce administrative complexity, the Commission to assess the public interest by applying a uniform, weighted formula that rewards diversity without any scrutiny of

broadcast content. Ideally, licensees should have a full property right in their licenses. A prospective broadcaster who believes his content will better serve the public interest, e.g., by serving a different audience or providing different content to the same audience, he should be able to purchase the LPFM license. Since the stations are much smaller than existing licensees, and more numerous, resale prices should be considerably more reasonable. As noted above, the problem is not lack of interest and demand for broadcasting, it is the Commission's decision to artificially limit the spectrum allocated to FM. As best demonstrated by the rapid expansion of the internet, very low entry barriers can quickly produce a dazzling array of diverse and specialized content. The Commission should move in this direction by allocating more spectrum to FM in order to keep the economic entry barriers, the price of a license, as low as possible, consistent with the need to avoid excessive receiver redesign.

If the Commission is not prepared to guarantee opportunities for renewal at this time, them -- as a fallback -- the Commission should: (a) defer the decision on license renewability until a date certain in the future; (b) in setting this date certain, allow at least 5 years for the community of newly licensed stations to develop a track record, and (c) indicate to possible LPRS licensees now in this proceeding, in clear terms, what kind of results the Commission will need to see later in order to justify a policy of guaranteed renewability.

B. APPLICATION FILING IN WINDOWS:

A series of application filing windows, as used successfully in the Low Power Television (LPTV) service, should work well for a new LPFM service. This method allows channels to be applied for on a demand-basis by applicants, in numbers and areas that best suit the applicants needs. The method of opening of a filing window, normally for a one week period, for new and, later, major-change applications could work well for this service. A problem with the allocation table method is that it acts like a magnet to draw competing applications by applicants that may not be as enthusiastic, serious or motivated about the channel as the applicant who went to the trouble to find a usable channel and then apply for it, hopefully uncontested. In this manner, the only way an applicant would face competition for his/her channel would be if another applicant coincidentally happened to file for the same FM channel in the same area. This method would contribute greatly to saving scarce Commission processing resources, since many applicants may be the only applicant (singleton) for a channel during a filing window and may get a quick grant, thus also speeding service to the public. When the Commission used to publish cutoff lists for LPTV channels, it drew far more applications from speculators who may not be the most qualified to receive the channel. Once the

Commission eliminated the cutoff list in favor of the one-week A filing windows,≡ it saw far fewer applications by more qualified applicants, many of which received a channel uncontested and proceeded with rapid construction. Therefore, for the new LPFM service, the Commission should abandon its traditional approach of allocating a channel to a community and then publishing its availability.

The demand-based system of filing windows described here has a proven record in the LPTV service and should be used for LPFM as well. Once the filing window closes, the Commission then can publish a list of applicants and give the standard 30-day period for petitions to deny. Any mutually exclusive applicants should then be scheduled for lottery to award the channel. The lottery system has worked extremely well in the LPTV service and speeds service to the public while conserving Commission resources. Due to the limited financial resources of the small businesses and individuals that will apply for LPFM ownership, auctions would not serve a useful purpose, either for the Commission, the applicants or the public. Application fees and annual regulatory fees can be used to pay for the cost of processing the applications and administering the service at the Commission.

C. FEES:

Licensing fees shall be affordable to all communities. A fee of \$100.00 is a reasonable amount. This keeps it affordable to any community, but also makes it high enough so as to insure only those who are serious about the commitment they are about to make to their community. In addition there should be no financial qualifications for obtaining an LPFM license. The costs of station construction and operation are relatively low. Self-screening should be a sufficient check to ensure the station will be constructed and operated as proposed.

D. CONSTRUCTION PERMITS:

1. USE IT OR LOOSE IT:

Stations should be required to unitize their construction and broadcasting permits within a reasonable amount of time after their issuance. If these deadlines are not met, these permits should lapse and go back into the pool. Additionally, those who lose a Construction Permit or broadcasting license should have to wait a year before applying again.

2. EXTENSIONS:

LPFM stations should be granted a maximum of one extension for a construction permit. There must also be no trafficking of construction permits or licenses. If a licensee fails to construct or operate a new station in a timely fashion, the license should be voided and new applications accepted.

3. TALKING BILLBOARDS:

GR opposes the use of LPFM licenses as A talking billboards and encourage the Commission to restrict this use to power levels consistent with Part 15 regulations.

4. FREQUENCY RESTRICTIONS:

There should be no restrictions as to the frequencies allowed for microradio stations. Microradio stations should have the ability to use any open spectrum, regardless of its location on the FM band.

5. RELAXING PUBLIC NOTICE REQUIREMENTS.

With the mass availability and acceptance of the Internet and the burdensome costs of placing advertisements in newspapers, it should be an option to an LPFM applicant to post their public notice on the Internet. Such notice can be done either via a USENET newsgroup, on a locally recognized web site such as a community=s major papers, or on a site readily identifiable as belonging to the LPFM station. LPFM stations should still have the option of using traditional print advertising.

6. HANDLING MUTUALLY EXCLUSIVE APPLICATIONS:

If the LPFM service is made noncommercial, auctions would not be required. For the primary services, LPFM stations should be licensed on a first come, first served basis. Applications would be filed electronically via the Internet. Access to the Internet virtually universal, and is readily available at most public libraries. For the secondary services, licensees can reach timeshare agreements through frequency coordinators. This will allow for a greater diversity of voices, especially in urban areas.

7. COMMERCIALS.

The FCC is weighing whether LPRS stations should be able to air commercials. If commercials are not allowed, many entrepreneurial stations will never be established -- and the community of LPRS stations will likely be dominated by highly ideological broadcasters (primarily political radicals and faith-based communities). In addition, local merchants will continue to be denied affordable advertising in their competition with the chains. Indeed, advertisers in general will be denied the lower advertising rates that might otherwise result from increased competition for advertising dollars. LPFM must allow for commercial (commercially supported) as well as noncommercial stations.

In 1997, four corporations collected 90% of all dollars spent on radio ads. That report comes from RADIO WORLD -- which also notes that these corporations collected only 80% of all radio advertising dollars the year before. The Commission should grant LPRS licenses to a reasonable mix of both commercial-free and commercial-airing stations. If the Commission determines that only noncommercial stations may be exempted from mandatory license auctions, then the Commission should: (a) make the LPRS entirely noncommercial, but also (b) define the regulatory term noncommercial to include stations which air commercials to the extent needed to cover reasonable costs (including decent salaries). The distinction on the FM dial between commercial and non-commercial is already quite blurred. In reality, there is very little difference to the listening public between the increasing use of sponsorship identification on so-called public radio stations and the tasteful use of advertiser supported messages on regular commercial stations.

8. PROGRAMMING:

LPFM stations should be locally programmed. Recorded materials such as poetry, locally selected music (not necessarily created locally), documentaries, features etc. may be used. Sharing of program materials and resources among LPFM stations is strongly encouraged. No more than 20% of air time may come from off-site feeds or syndicated tapes. LPFM is the perfect opportunity for the local community to experience music that is seldom if ever heard on radio, including college radio. It only stands to reason that if an LPFM is to survive, and is not responding to what that community wants, the station wouldn't be around long. A 75% requirement of local programming should be implemented. Also all LPFM stations should be subject to the same standards as full powered stations when it comes to obscenities.

9. RETURN OF STOLEN PROPERTY BY FCC:

Any Apioneer≡ station shut down by the FCC should have its equipment returned be returned and be compensated for any damage to said equipment as well as one hundred dollars per day for every day they were off the air, provided they were not causing interference. Also, the Commission should provide a public apology in local papers, TV and new LPFM stations for violating the statutory and First Amendment rights of citizens who were simply exercising these rights to both serve the public interest and to help pressure the Commission to end its blanket ban on microradio.

10. HOURS OF OPERATION:

Stations operating over 100 watts should be subject to the same regulations as full power stations. Stations of 100 watts or less should have no limits on station hours of operation. A micro station operating in the interest of the community would be subject to the wishes of Athat≡ community and thus provide hours of operation that are fulfilling to that specific community. Time sharing with another LPFM station in this community would be applicable in this instance.

11. EAS SYSTEM.

Since it is proposed that stations over 100 watts only be licensed to rural areas and smaller markets, it is very important that those licensees participate in EAS and the Commission should impose requirements for monitoring equipment and shut down for non-participation. Stations operating 100 watts or less may not be powerful enough to provide an effective emergency service and should not be subject to those requirements. Moreover, every urban area is served by a sufficient number of larger broadcasters that any EAS requirement on new LPFM stations would not only be costly and wasteful, but also redundant.

12. STATION IDENTIFICATION REQUIREMENTS.

LPFM Stations should be subject to some form of 4 letter call sign, similar to full power stations. However, stations of 100 watts or less should not be subject to hourly on-air identification. A station ID within each 4 hour period as a minimum would be sufficient. Modern receiver technology and the relatively power and greater audience

specificity of LPFM stations make repeated station IDs unnecessary as there is no significant chance for public confusion.

13. PUBLIC FILE.

LPFM stations should be subject to the same rules as full power stations when it comes to stations being made available for inspection. LPFM stations want to comply with the rules just as much as full power stations do. All LPFM stations should maintain a public file. In the case of stations operating 100 watts or less, they should be allowed to place their public files on the Internet in lieu of having a public inspection location since many of these stations may be operated from private residences.

VIII. OWNERSHIP RESTRICTIONS:

The LPRS will best serve the public if it consists of small stations, owned and operated by small institutions (and individuals), with a high degree of operational autonomy. To reach this result, one-to-a-customer licensing is vital. It may be the single most important factor in blocking absorption of stations into chains or sustaining the same type of concentration now occurring among full power stations. Over 13,000 individuals and groups requested information on Low Power Radio in 1998. Allowing multiple ownership would make it difficult to accommodate these requests as well as the others that are certain to follow a rulemaking change on Low Power Radio. There should be no exceptions to the limit of one license per individual or institution. Ownership of multiple stations does not serve the stated goals of a Low Power Radio Service. The proposal of a 5 station maximum would, in fact, deny access to the spectrum to 4 groups or individuals who deserve to have a voice. Multiple ownership does not increase access or diversity. Awarding licenses for new low power FM radio stations would empower local communities with a new public forum to express its many voices, cultures, ideas, and needs. Low power radio stations will create a much needed public forum for a variety of groups-including community activists, youth, ethnic and linguistic minorities, gay communities, religious communities, local artists and cultural associations - and provide a forum for dialogue and debate about important local and public interest issues. These kinds of stations would strengthen community identity in urban neighborhoods, rural towns and other communities which are currently too small to win attention from mainstream, profit-driven media.

The strong interest in independent radio stations shows that the creation of this new low power radio service has wide public support. The tremendous demand for

microradio is demonstrated by the emergence of a national Free Radio Movement, widespread civil disobedience, constitutional challenges of the Commission=s aggressively enforced 21-year ban, as well as the proliferation of unlicensed community radio stations supported by local government, whose operators broadcast at the risk of financial losses, seizure of property, arrest, and in some cases, imprisonment.

With over 13,000 people inquiring regarding the possibility of obtaining a license for low power broadcasting in their communities, the Commission should legalize microradio in order to benefit those community groups whose interest in microradio is to communicate, to educate, to inform, and to entertain, and not who=s primary interest is the purely profit. Broad citizen access to information and culture is at the heart of a democratic society. But, there must be strict rules governing the number of LPFM stations an individual or organization can own. Without ownership restrictions, a LPRS will be unworkable and meaningless. To support this vision, in addition to the Aone to a customer= rule, the Commission should implement microradio with the following restrictions consistent with the public interest in maximizing the number and diversity of voices. Whatever synergies are possible among LPFM broadcasters, and there are certainly too many to list or even imagine, can be accomplished through voluntary cooperation and sharing arrangements consistent with these restrictions.

A. NO FULL POWER , MEDIA OR GROUP MEDIA, CROSS OWNERSHIP:

Existing license holders of full power radio stations should be ineligible. Owners of television stations, cable television operations or their parent companies should be ineligible.

Owners of newspapers, periodicals or other print or Internet media, if part of an organization that holds multiple media outlets of this type, should be ineligible to obtain an LPFM license.

B. LOCAL & MINORITY OWNERSHIP:

Since the passage of the Telecommunications Act of 1996, the percentage of ownership of media by minorities and women has actually dropped, due in part also to the discontinuance of minority tax certificates. As this Commission struggles with how to improve the minority ownership levels of full-power radio and television stations under the strict limits imposed by the courts, this petition provides a method for significantly increasing minority ownership in a rapid, widespread and meaningful manner. By employing the local ownership restrictions stated in this petition, involving a local

ownership requirement providing proof of local primary residence within the reception contour of the stations signal, only local owners will have a chance to apply for these licenses. Since, it is presumed, that a large majority of micro radio stations will be in the 100 watt or less category, stations will be able to be constructed for very little investment, perhaps less than the cost of a new car, thus assuring significant minority ownership. After all, it is the high cost of existing licenses, artificially inflated by deliberate government action -- not lack of interest or demand -- that has kept minorities and those of modest means off the air. Indeed, with this low barrier to entry, minority preferences, tainted with questionable constitutionality, are not needed. In order to preserve localism and assure responsiveness to the community, owners and all stockholders, (if a corporation) must live within the reception contour of the LPFM station.

By requiring owners to live within the station=s contour, the community will benefit by having station owners who have an intimate knowledge of the community=s needs and interests. These station can survive commercially since they will be able to cater to many small businesses whose trading areas closely match their coverage areas. This efficiency will allow many small businesses across the country to advertise on radio (many for the first time) without having to pay the higher rates of full-power stations that cover areas outside of their major trading area (wasted coverage). Lower rates of LPFM stations will also allow small businesses to air more spots and thus increase their effectiveness on radio. This competition will benefit the public not only by increased voices in the community but also may spur on some full-power stations to better serve their communities. This will result in the most efficient utilization of the spectrum in the FM band, filling in the gaps not large enough to accommodate a full-power station. This same principle has been accomplished with great success in the Low Power Television (LPTV) industry and will work for LPFM as well.

C. ABACK DOOR" LICENSING.

Even a licensing limit of Aone to a customer= leaves the door open to multiple licenses gained through affiliates, subsidiaries, franchisees and/or agents of a single institution or individual.

The Commission should ban the acquisition of LPRS licenses by affiliates, subsidiaries, franchisees and/or agents of an institution or individual. In the case of institutions (including nonprofit institutions), a maximum of one license should be granted -- to the parental institution only. With individuals, a maximum of one license should be granted -- to principals only.

D. SIZE AND INCOME RESTRICTIONS:

If the LPRS licenses are to be held only by individuals, the smallest of small businesses and the smallest of small non-profits, criteria for determining what is A small will be necessary.

E. Small Business Definition / Need for Reassessment

The Commission erred previously when it adopted the Small Business Administrations (SBA) definition of a small business as one having \$6 million net worth and less than \$2 million in annual profits for each of the two previous years. This is far too high and certainly not an effective limit on A small business. The fact that over 93% of all radio stations in the nation qualify as a small business under this inflated definition indicates that some experienced lobbyists were involved in drafting this definition. Indeed the limit may be exaggerated by over 80% in order to garner the largest number of large businesses under the small business umbrella. I believe a much more realistic definition of small business would be one with a net worth of under \$2 million and annual profits of under \$500,000. This still would include the vast number of truly small businesses that are entitled to this classification. The Commission should institute whatever proceedings are necessary to change its definition of small business to reflect a more realistic definition.

IX. ASSURE THAT THE LPRS IS MEANINGFUL

Although other issues are clearly relevant, the preceding policy recommendations should lay an adequate foundation for LPRS viability. The LPRS must be meaningful as well as viable. If the new LPFM service is turned into A business as usual under another name, then the promised benefits of the LPRS will remain but a promise. As an even graver matter, the legitimacy of the Commission -- and, more broadly, of the government and political system that stands behind it -- will be slashed again by another A self-inflicted wound. The FCC's consideration of LPFM in general, and issuance of MM 99-25 in particular, has A brought back from the brink a wide range of alienated Americans. The revived hopes of these people should not be dashed.

For many of these alienated Americans, this proceeding is not A just about low power radio. On a level that is only slightly deeper, it is really about whether the system can be trusted. For some Americans -- whose ranks are drawn from left-of-center

political activists, right-of-center political activists, people of color seeking upward mobility, young adults seeking direction and "A middle Americans from main street" -- this may be the last chance the "A system" will ever get to provide locally owned and locally responsive radio.

Dashing the newly revived hopes of these people now would do great harm -- especially if the hopes are dashed through a deception that either cancels the rulemaking or establishes LPFM "in name only." It cannot be good for the country to have hundreds or thousands of highly motivated, ambitious and/or idealistic citizens conclude they cannot achieve their goals within the system that now exists. The Commission should not scuttle this vital opportunity.

X. CONCLUSION:

For the reasons set forth herein, GR urges the Commission to: (a) proceed as quickly as possible with issuance of a final rule in Docket MM 99-25 that will establish a LPRS; and (b) adopt all of the policy recommendations which are contained herein, in order to assure that the LPRS will be both viable and meaningful.

Furthermore microbroadcasters who have had the courage to move to the front lines in the battle for change and began to broadcast in a responsible manor, and have suffered government seizure of their property, had fines levied against them, or any other penalty should have their property returned, fines waved or moneys returned (with interest), and not be penalized in any manor what so ever in the upcoming licensing system. In fact, those same broadcasters should, and must be granted priority status in receiving an LPFM license. For it was not until there was cohesive national pressure from unlicensed microbroadcasters who felt that the current licensing structure is unjust, that the Commission responded with the NPRM. The unlicensed broadcasters have been the pioneers in the effort to bring national attention to the need for a LPFM radio service. Many of whom have suffered great emotional distress, and certainly deserve, at the least, to have equal opportunity in any new licensing system. This includes even those who have continued to broadcast (without harm or significant interference to other stations or services) after the issuance of the NPRM. Historically it has often taken the Commission years to make decisions. Those who have chosen to continue to engage in broadcasting have done so in order to continue to bring attention to the issue and serve their community. GR and its counterparts have engaged in peaceful civil disobedience and rightfully expressing our opposition to a ban on small speakers that is unjust and has become a blatant violation of both the Communications Act and the First Amendment.

The proposals contained within this petition will provide the following benefits and advantages to the communities to which they serve:

- 1) Provide for community revitalization.
- 2) Make more efficient use of the FM spectrum without interference.
- 3) Provide the listener many more choices.
- 4) Allow new talent into the radio market that otherwise would never have the opportunity, both in on air personalities and musical selections.
- 5) Provide a media outlet for political activism.
- 6) Allow new minority entrants into the radio market by increasing diversity.
- 7) Create new economic activity and jobs at many levels, including but not limited to; radio personalities equipment manufacturers and suppliers, and new entrepreneurs.
- 8) Provide affordable radio advertising to small businesses.
- 9) Help level the playing field in the broadcast industry by lowering barriers to entry for radio stations ownership.
- 10) Create a large number of locally owned radio stations that will be more responsive to the needs and issues to the local community.

The Commission should proceed as quickly as possible to implement the LPRS consistent with the modifications discussed here.

Respectfully submitted,

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Szoka

COMMUNITY SUPPORTERS & LISTENERS:

The following are a list of names and address that have asked to be supporters of GR and fully support the rapid implementation of an LPRS as proposed in the NPRM with the modifications presented here.

The names listed here comprise only but a fraction of the listening audience of Grid Radio and an even smaller fraction of the audience Grid Radio is sure to acquire once it is licensed at its full power and potential.

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|--|---|--|
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| MARY BONECE 18900 DETROIT RD. LAKEWOOD,OH 44107 44105 | MIKE KALABOGIAS 1644 WARREN RD. LAKEWOOD,OH 44107 | SEAN HOFFMAN 3611 E55 th ST. CLEVELAND,OH |
| SEAN O=MALLEY 11021 CLIFTON BLVD. CLEVELAND,OH 44102 44113 | GEORGE A. JECKER 2178 LEE RD. CLEVELAND HTS,OH 44118 | J.T. FREGER 2002 W10th ST. CLEVELAND,OH |
| RANDY BURNETT 2023 W 105th ST. APT 43210 CLEVELAND,OH 44102 | PAT BASNETT CARROL AVE. CLEVELAND,OH 44113 | RONALD ASERMAN 6990 RAVERSWOOD AVE. PARMA,OH 44139 |
| MICHAEL HARRISON 5611 HARVARD #219 CLEVELAND,OH 44105 44094 | CHRISTINE PERRINE 13839 CLIFTON BLVD. LAKEWOOD,OH 44107 | WILLIAM J. BERES 38150 Tomarac Blvd. WILLOUGHBY,OH |
| KERWIN BERYOUR CLEVELAND 13408 DARLEY AVE CLEVELAND,OH 44110 44112 | JOHN COYNE 1636 ORCHARD GROVE LAKEWOOD,OH 44107 | KEVIN M. 14002 ALDER AVE. E.CLEVELAND,OH |
| STEVE DRDA 6145 CREEKHAVEN #8 Lane PARMA HTS., OH 44130 | JOSE ROSARIO 311 COLORADO AVE. LORAIN,OH 44052 | CHARLES F. FAY JR. 9756 Country Scana CONCORD,OH 44060 |
| GABE SOCHA 24671 GLENFORREST DR. EUCLID,OH 44122 44131 | BRUCE E. BRANDON III 1656 DENWOOD ALLIANCE,OH 44601 | JOE SPIRAKUS 1470 E. RIDGEWOOD SEVEN HILLS,OH |
| JOHN STONE | WILLIAM DEVER | JENNIFER CRITES |

3640 COLUMBUS RD.
Olmstead Falls,OH 44130
44113

ARTHUR L. BLAKEY II
1403 E86th ST.
CLEVELAND,OH 44106
44077

LISA MARLEY
1318 FRY AVE.
LAKEWOOD,OH 44107
44102

TIM LAVELLE
11021 CLIFTON BLVD.
CLEVELAND,OH 44102

DERRIK PFEIESTER
1648 WATERBURY RD.
LAKEWOOD,OH 44107

MICHAEL SHERRY
1648 WATERBURY RD.
#5
LAKEWOOD,OH 44107

MATTHEW DAVIS
1374 E 25th ST.
CLEVELAND,OH 44114

SCOTT LARNEY
PO BOX 43515
CLEVELAND,OH 44143
44137

ALEX BERK
5040 CLIFTON AVE.
LORAIN,OH 44054
44143

12905 ARLISS
LAKEWOOD,OH 44107

JOHN McLUCAS
1422 ALAMEDA AVE.
LAKEWOOD,OH 44107

ROBERT DROWN
1668 WINCHESTER DR
WESTLAKE,OH 44105

DEVON BARETT
217 CRAWFORD CT.
CLEVELAND,OH 44113

SARAH GIBBONS
1422 ALAMEDA AVE.
LAKEWOOD,OH 44107

MATTHEW T. LINCHAN
243 ROWAN DR.

BEREA,OH 44017

CHESHARA MARSHALL
19590 EUCLID AVE. #110
EUCLID,OH 44117

LAUREL S. LIPP
1215 W 10th ST. #826
CLEVELAND,OH 44113

PARTICK BINDIS
1303 W 89th ST.
CLEVELAND,OH 44102

781 CRAWFORD CT.
CLEVELAND,OH

DAN CROSBY
11570 GIRDLED RD.
Concord Tshwp.,OH

BRETT SNYDER
11021 CLIFTON BLVD.
CLEVELAND,OH

HOLLY CLIFFEL
1000 PARKSIDE DR.
LAKEWOOD,OH 44107

RACHELE MARTIN
13839 CLIFTON BLVD.
LAKEWOOD,OH 44107

GERRY KEATING
13346 MADISON AVE.

LAKEWOOD,OH 44107

JEFF BAKER
1314 COVE AVE.
LAKEWOOD,OH 44017

DON KRUSINSKI
15809 ROCKSIDE RD.
MAPLE HTS., OH

TONY MARINO
374 BALMORAL DR.
Richmand Hts.,OH

DOROTHY CIESLA
1429 RIGEWOOD
LAKEWOOD,OH 44107
44144

GERG A. BELL
1321 W 116th ST.
CLEVELAND,OH 44102

TIM KACZMAREK
4203 W 48th ST.
CLEVELAND,OH

JOEL READENCE
12060 LAKE AVE. # 306
LAKEWOOD,OH 44107

DAVID T. LONG
2851 BAILEY N.W.
MASSILLON,OH 44646

THOMAS E. COLE
2851 BAILEY N.W.
MASSILLON,OH 44646

WM. MALLOI II
1263 W BLVD. FL.#3
CLEVELAND,OH 44102
44113

KA\EVIN J. KEENEY
1319 W 112th ST. #1
CLEVELAND,OH 44102

CHRIS DENNISON
955 W. ST. CLAIR
CLEVELAND,OH

BRANDON IKERD
1319 W 112th ST. #1
CLEVELAND,OH 44012
44102

ROBERT L. LEWIS
1223 W 6th ST.
CLEVELAND,OH 44113

Rodger Littammac, Jr.
1311 W 87 th ST. UP
CLEVELAND,OH

PEDRO ASUARADO
1319 W 125th ST. APT 22590
CLEVELAND,OH 44102

BROOK WILLIS
W 15 th ST.
CLEVELAND,OH 44113

RICK SPAHAR
12900 LAKE # 203
LAKEWOOD,OH 44107

LANCE BRADESKU
3316 COLBURN AVE.
CLEVELAND,OH 44109
44507

AARON SERMAK
6990 RAVENSWOOD AVE.
PARMA,OH 44129

MAURICE WHITE
85 E. DELASON
YOUNGSTOWN,OH

FREDHEROY LAWSON
3322 W 61st ST.
CLEVELAND,OH 44102
44109

FRANK KEHIES
510 COLUMBUS AVE.
SANDUSKY,OH 44570

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3783 W 22nd PL. # 102
CLEVELAND,OH

Leslie Pedraza Pirritano
1141 LAFAYETTE ST.
SANTA CLARA.CA 95050
44113

DIANA POWERS
1429 RIDGEWOOD AVE
LAKEWOOD,OH 44107

DAVID POSTERARO
3904 BRIDE AVE
CLEVELAND,OH

JAY BLAIR

TONY CORREA

DOUG STARCHER

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|---|--|--|
| 10011 CLIFTON BLVD. #6 CLEVELAND,OH 44102 | 4593 W 148th ST. CLEVELAND,OH 44135 | 1548 ALAMEDA LAKEWOOD,OH 44107 |
| JOHN ROOSE 1210 W. BLVD #404 CLEVELAND,OH 44102 | RICHARD MILLER 1235 W 6th ST CLEVELAND,OH 44113 | KHRIS SMITH 2805 W. NORTH A ST. TAMPA,FL 33609 |
| MATT STANFORD 1466 W110th ST. #407 CLEVELAND,OH 44102 44147 | ROBERT ELDEN 26151 LAKESHORE BLVD. EUCLID,OH 44132 | VITOLIY DUDIY 1200 SENECA BLVD. Broadview Hts.,OH |
| MIKE SCHULTZ JEFFRIES 8225 CALLOW RD. 3 PAINESVILLE,OH 44077 44112 | STACY SANTA 2172 REXWOOD #1 Cleveland Hts.,OH 44118 | YALANDE G. 14608 Savannah Ave. # East Cleveland,OH |
| GREG MONTE BROWN 9407 CLIFTON BLVD. BLAMBLESIDE CLEVELAND,OH 44102 | BRENDTON CARL 9407 CLIFTON BLVD. CLEVELAND,OH 44102 | DAVID GREATHOUSE 123-306 MENTOR,OH 44095 |
| TONY MARINO 374 BALMORAE DR. CLEVELAND,OH 44143 44116 | MATT CZAGA 4483 BROOKS RD. CLEVELAND,OH 44105 | ERICA BLECH 18851 HILLARD # 8 ROCKY RIVER,OH |
| MEGHAN M. KELLY 20400 DETROIT RD. # 9 ROCKY RIVER,OH 44116 | DANDE COURNOYER 2530 Superior Ave. E #200 CLEVELAND,OH 44114 | DALLAS FORRESTAL PO BOX 45472 WESTLAKE,OH 44148 |
| LARRY FIZER 3801 WHITMAN AVE CLEVELAND,OH 44113 44138 | JEANETTE HERMANSOR 1151 N. JEFFERSON # 32 MEDIAN,OH 44256 | SEAN RODGERS 6212 LEWIS RD. Olmstead Tnshp. ,OH |
| TIM KALZMAREK | JORGE O. VILLA | ERIC ANDERSON |

4203 W 48th ST.
CLEVELAND,OH 44144
44106

JUAN CUEVAS
3811 WHITMAN
CLEVELAND,OH 44113

SUZI HUNT
1598 LAKEWOOD
LAKEWOOD,OH 44107

RANDY WINES
5013 HERMAN AVE.
CLEVELAND,OH 44102
44102

WILLIAM ATTEWELL
JR.
2154 THURMAN AVE.
RD.
CLEVELAND,OH 44113

JOHN BALAZY
15646 SHELDON RD.
BROOKPARK,OH 44142
21231

MIKE PATRICK
1909 E. Turkeyfoot Lk.RD.
AKRON,OH 44312
HTS.,OH 44130

MARY ANN TRIMARCO
1493 LARCHMONT AVE.
LAKEWOOD,OH 44107
44135

TIM YOUNG
2910 DARLINGTON RD.

3811 WHITMAN
CLEVELAND,OH 44113

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12000 Edgewater Dr. # 205
LAKEWOOD,OH 44107

JOSEPH M. ALVELO
1321 W 116th ST.
CEVELAND,OH 44102

DAVID STEEVES
27600 CHARDON RD. # 580
Willoughby Hills,OH 44092

CHUCK SLUSARCZYK JR.
2154 THURMAN AVE.
CLEVELAND,OH 44113

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3190 MAYFAIR RD.
AKRON,OH 44312

MELISSA BRITO
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JEFFERSON,OH 44047

MARGIE VACCA
2790 PEARL RD.
MEDIAN,OH 44256

TIM STOLL
7908 RT 113

3209 W 98th ST.
CLEVELAND,OH

MYKE MOSES
1166 AVONDALE RD.
S. EUCLID,OH 44121

TERI L. CICCIAVELLI
5806 CHARLES AVE.
PARMA,OH 44129

RICK RAUPACK
5013 HERMAN AVE.
CLEVELAND,OH

WAYNE L. HARRIS
1909E. Turkeyfoot Lk.
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1637 EASTERN AVE.
BALTIMORE,MD

DAVE TALBOT
N. Whitedove # 304
MIDDLEBURG

ANNE DOME
14552 MISSION RD.
CLEVELAND,OH

CLARISSA CARTER
1493 LARCHMONT

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| AVE BEAVER FALLS,PA 15010 | BERLIN HTS.,OH 44814 | LAKEWOOD,OH 44107 |
| JEFF KLINE 14814 CLIFTON BLVD. #204 LAKEWOOD,OH 44107 44102 | JOE WATTS 4701 SPRINGWOOD DR. BROOKLYN,OH 44144 | MARC R. COPFER 1303 W 89th ST. CLEVELAND,OH |
| JAYSON MITCHELL 20606 LORAIN RD. FAIRVIEW PK.,OH 44126 44126 | KATHLEEN FLORES 2330 BLAKE ST. #1 BERKELEY,CA 94704 | WAYNE CASE 20606 LORAIN RD. FAIRVIEW PK.,OH |
| BRANDON IKERD 1319 W 112th ST. APT 1PO BOX 14461 CLEVELAND,OH 44102 44114 | PEDRO PLVARADO CLEVELAND,OH 44114 | CELLSO 1764 E 32nd ST. CLEVELAND,OH |
| FRED S. ARROYO 1319 W112th ST. CLEVELAND,OH 44102 44135 | ANTHONY COLLINS 154 PULASKI ST. BEREA,OH 44017 | RONALD KINAKO 4585 W 149th ST CLEVELAND,OH |
| MARIE RANDA 521 NEW ST. Fairport Harbor.,OH 44105 44102 | MICHAEL J. CURRY 720 PAYNE AVE. AKRON,OH 44302 | JOHN DESMONE 1901 W 50th ST. CLEVELAND,OH |
| TED THEOS SZPOTOWICZ 3907 JOHN AVE. CLEVELAND,OH 44113 | DANNY HERNANDEZ 1335 W 108th ST. CLEVELAND,OH 44102 | CHRISTIAN 5402 LAVERNE AVE. PARMA,OH 44129 |
| DEAN GATES 3514 MAPLEDALE AVE. CLEVELAND,OH 44109 | FRANKIE ROMARIO 5513 W 134th ST. CLEVELAND,OH 44135 | DAVID J. LERY 24580 LAKESHORE # 6 EUCLID,OH 44123 |
| GEORGE MORRIS 6801 CLAASEN AVE. CLEVELAND,OH 44105 | TONY CORREA 4593 W 148th ST. CLEVELAND,OH 44135 | RACHEL LECHNAR 1318 FRY AVE. LAKEWOOD,OH 44107 |

TERRY WAGNER
267 TREAMSVILLE # 303
D27
TOLEDO,OH 43613
44130

JEFF JOHNSON
1215 W 10th ST. # 810

CLEVELAND,OH 44113

DARYL DUBROY
7669 Normandie Blvd.

Middleburg Hts., OH

JEFF YOUR
1076 WOODVIEW RD.
Cleveland Hts.,OH 44121

TOM & JILL CULLINAN
2899 CLARKSON RD.
Cleveland Hts., OH 44118

GREGG CAVINS
2136 GRAHAM RD.
STOW,OH 44224

JILL CHAPMAN
20120 LORAIN RD. # 308
AVE.
FAIRVIEW PK.,OH 44126
44109

MICHAEL J. TOMLIN
6960 SPENCER LK. RD.

MEDINA,OH 44256

KEVIN P. KUBOVCIK
4304 BROOKLYN

CLEVELAND,OH

RYAN CLARK
STAINBROOK
2090 LEWIS DR.
LAKEWOOD,OH 44107
44118

JULIANN STAINBROOOK

3613 CUMMINGS RD.
Cleveland Hts., OH 44118

MATTHEW

3613 CUMMINGS RD.
Cleveland Hts., OH

MICHEAL BLAKE
11820 EDGEWATER DR.
RD.
LAKEWOOD,OH 44107

HEATHER RIGGLE
9273 SHADY LK. DR. #201-I

STREETSBORO,OH 44241

STEVE COSTELLO
23791 GREENWOOD

EUCLID,OH 44117

ALEXIS BERRIOS
13494 CLIFTON BLVD.
8
LAKEWOOD,OH 44107
44133

ROBERT S. BLACK
2135 POLO RUN DR.

YARDLEY,PA 19067

ROLAND KOSTERA
9800 COVE DR. APT H-

N. ROYALTON,OH

MAXIMO ESTREMERA JR.
6104 Meadowbrook Ave.
AVE.
CLEVELAND,OH 44102

TOM KENNEDY
1597 FRUITLAND AVE.

MAYFIELD HTS., OH 44124

RUSSELL GRIGG
1334 NICHOLSON

LAKEWOOD,OH 44107

STEPHANIE RIVERA

CHRIS STORER

MICHELLE

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|---|--|---|
| GOTTFRIED 1718 CLARK AVE. CLEVELAND,OH 44109 44136 | 15809 LORAIN AVE. #2 CLEVELAND,OH 44111 | 21981 Little Brook Way STRONGSVILLE,OH |
| Rosemarie Kazarovich 2000 E 9th ST. # 310 CLEVELAND,OH 44115 | BRUCE DONNELLY 3566 STRATHAVON RD SHAKER HTS.,OH 44120 | JOANNA HART 1951 WRENFORD RD. S. EUCLID,OH 44121 |
| ANIKO PRISKO 25140 LAKE RD. BAY VILLAGE,OH 44140 44102 | BETH GLADEN 1585 WARREN RD. LAKEWOOD,OH 44107 | SANDRO GALINDO 1349 W 61st ST. CLEVELAND,OH |
| JOHN TUCKY 5246 STATE RD. 101 PARMA,OH 44134 | MATT McCOY 5676 Broadview Rd. # 203 PARMA,OH 44134 | ELIZABETH VELEZ 12010 LAKE AVE. # LAKEWOOD,OH 44107 |
| ALLAN TESCH 404 33rd ST. SE RD. CANTON,OH 44707 44140 | ROLF TAYLOR 14124 SUPERIOR RD. E. CLEVELAND,OH 44118 | BOB RHUBART 611 CANTERBURY BAY VILLAGE,OH |
| JULIUS FARKAS 8010 MANSFIELD CLEVELAND,OH 44105 44105 | RANDY BEITER 12525 Edgewater Dr. # 223 LAKEWOOD,OH 44107 | PHILIP REED 6100 HEISLEY RD. CLEVELAND,OH |
| TINA BRANDON 12115 VALLEY LN. # 204 GARFIELD HTS.,OH 44125 44039 | LEANNE HERLEVI 10673 COVE AVE. #100 LAKEWOOD,OH 44107 | JOHN REGAL 33973 GAIL DR. N. RIDGEVILLE,OH |
| BRANDON PELOK 240 Fox Hollow Dr. # 310 MAYFIELD HTS., OH 44124 | DANIEL PONGALLO 8208 BROADMOOR RD. MENTOR,OH 44060 | JACK BASHIAN 2397 GLENN ECHO HUDSON,OH 44236 |
| MIKEL POMEROY | ROBIN WEBBER | SASHI KOLLI |

1900 W 25 th ST. # 201
CLEVELAND,OH 44113
44126

ERICK ADAM SANDERS
2508 A E 55th ST.
315
CLEVELAND,OH 44104

CHRIS GOUMAS
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BRUNSWICK,OH 44212
44142

RAMEZ MALATY
13649 DONALD DR.
BROOKPARK,OH 44142
44142

DAVID DAMIAN
13649 DONALD DR.
BROOKPARK,OH 44142
44119

YVONNE McCALL
19601 KILDEER AVE.
CLEVELAND,OH 44119
44102

LAURENTIU BIRSAN
1381 W 69th ST.
CLEVELAND,OH 44102
44111

OVIDIU PARASCA
10701 FLORIAN AVE.
CLEVELAND,OH 44111
44136

ADRIAN PATRESORE

12010 LAKE AVE. # 101
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DONALD RALEIGH
20555 WILLIAMSBURG CT.
Middleburg Hts.,OH 44130

THOMAS ESTON
27391 SECOND ST.
WESTLAKE,OH 44145

LOURIS MALATY
13649 DONALD DR.
BROOKPARK,OH 44142

ALI OBADI
12000 Edgewater Dr. # 102
LAKEWOOD,OH 44107

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951 RUCHLEIGHT RD.
Cleveland Hts., OH 44133

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1381 W 69th ST.
CLEVELAND,OH 44102

RENE HRUSKA
6961 ARLINGTON ST.
BREAKSVILLE,OH 44141

SEASON MITCHELL

4020 DIANE DR.
FAIRVIEW PK. ,OH

ROBERT ELDER
26151 Lakeshore Blvd. #
EUCLID,OH 44132

LIDIA MALATY
13649 DONALD DR.
BROOKPARK,OH

ANGEL DAMIAN
13649 DONALD DR.
BROOKPARK,OH

LEE WILLIAMS
19601 KILDEER AVE.
CLEVELAND,OH

NICK PUSCAU
2087 W 105th ST.
CLEVELAND,OH

MARIO SANTO
11012 LINNARD AVE.
CLEVELAND,OH

MARK LATRONICA
22449 SPRAGUE RD.
STRONGSVILLE,OH

BECKY BRUNING

34076 GARLETT DR.
N. RIDGEVILLE,OH 44039
44102

5305 Big Creek Pkwy. # 6
PARMA,OH 44129

4321 W 60th ST.
CLEVELAND,OH

SHERMEIL DASS
11119 LAKE AVE. # 406
CLEVELAND,OH 44106
44114

DANIZA IANNOTTI
6340 STUMPH RD. APT 4-B
PARMA HTS.,OH 44130

C.J. DALUKA
1235 MARKETTE ST.
CLEVELAND,OH

JOSEPH KOLZE
2030 W 105th ST
10
CLEVELAND,OH 44102
44109

BERNBY GONZALEZ
3234 W 54th ST.
CLEVELAND,OH 44102

DOUG EDWARDS
1809 Pleasentdale Rd. #
CLEVELAND,OH

MARK MALLEO
4264 W 48th ST.
CLEVELAND,OH 44114
44102

BEN GORE
3221 JOSLYN RD.
CLEVELAND,OH 44111

CHRIS ARTHUR
1372 W 114th ST.
CLEVELAND,OH

JOHN GREER
1334 COOK AVE.
LAKEWOOD,OH 44107

BRIAN AGATONOVIC
7260 STATE RD.
PARMA,OH 44134

RONALD LEAMAN
2058 ELMWOOD AVE.
LAKEWOOD,OH 44107

MARK MURPHY
3816 FULTON CT.
CLEVELAND,OH 44113

MARIA ARMSTRONG
3816 FULTON CT.
CLEVELAND,OH 44113

MAE ALIE
PO BOX 1633
WARREN,OH 44482

NICOLE CIFANI
2020 SAVANNAH PKWY.
WESTLAKE,OH 44145
44113

RENEE LECK
2923 JAY AVE
CLEVELAND,OH 44113

ANOREA MUTO
2923 JAY AVE.
CLEVELAND,OH

STEVE VANSLYCK
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DR.
S. EUCLID,OH 44118

TONY RIEFSTAHL
3885 COLONY RD.
S. EUCLID,OH 44118

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LAKEWOOD,OH 44107

MICHEAL I FERGUSON
12525 Edgewater Dr. # 321

FRANK J. VACCARO JR.
3514 MAPLEDALE

ERIN K. GRADY
11864 Clifton Blvd. # 30

| | | |
|---|--|--|
| LAKEWOOD,OH 44107 | CLEVELAND,OH 44109 | LAKEWOOD,OH 44107 |
| CHAD H. MOSES 11864 CLIFTON BLVD. #30 BLVD. LAKEWOOD,OH 44107 44130 | NORMA WILSON 29308 OSBORN RD, BAY VILLAGE,OH 44140 | KINGSLEY MAGPOC 11277 WOODVIEW PARMA HTS.,OH |
| SUE GIBBONS 4023 W 222nd ST. FAIRVIEW PK, OH 44126 44138 | MARK LOPATKA 4023 W 222nd ST. FAIRVIEW PK,OH 44126 | RITH COX 17 LEES LN. N.OLMSTEAD,OH |
| JANINE M. WALLS 5557 ELMWOOD AVE. MAPLE HTS.,. OH 44137 | VALERIE FERRARO 146 EMERSON DR. BEREA, OH 44017 | |